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# Before the Federal Communications Commission

Washington, D.C. 20554

> FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Services, (Fairview, Pennsylvania)

MM Docket No. 93-250

RM - 8331

To: Chief, Allocations Branch Policy and Rules Division Mass Media Bureau

# REPLY COMMENTS OF THOMAS J. SAUBER

Thomas J. Sauber ("Sauber"), by his attorney, hereby respectfully submits his reply to the comments and counterproposal in the instant proceeding relating to the proposal to allot Channel 298A to Fairview, Pennsylvania. reply thereto, it is stated as follows:

In addition to the proposal of KDC, Inc. ("KDC") to allot channel 298A to Fairview, Pennsylvania, there were two (2) timely filed counterproposals to allocate the same channel to alternative communities.

Sauber in his counterproposal requested that channel 298A be allotted instead to the isolated community of Cambridge Springs, Pennsylvania. North Kingsville Broadcasting ("NKB") filed a counterproposal suggesting that it was more in the public interest to allot Channel 298A to North Kingsville, Ohio and that NKB "is willing to limit power in the direction of Stratford and Welland as necessary to avoid overlap to both Canadian channels."

> No. of Copies rec'd List ABCDE

# I Alternative Allotment Resolutions

In <u>FM Allotments (Pinewood, South Carolina)</u>, 5 FCC Rcd 7609, 7610 (1990), the Commission stated that:

"After the counterproposal deadline, we believe it is appropriate for a party in a proceeding to suggest alternative channels which may lead to a resolution with respect to the communities already at issue in the proceeding."

Thus, "after the counterproposal deadline" the parties in this proceeding are KDC, Sauber, and NKB, while the "communities already in issue in the proceeding" are Fairview and Cambridge Springs, both in Pennsylvania, and North Kingsville, Ohio.

As the Engineering Exhibit attached hereto as att. No. 1 shows:

enough to place a city grade contour over Cambridge Springs."

Moreover, the allotment of Channel 298A to Cambridge Springs is a more "efficient" use of the broadcast spectrum than that of allotting it to Fairview, because allotment to Fairview will require the use of a directional transmitting antenna to protect Canada. However, the use of Channel 298A at Cambridge Springs will permit a fully utilized non-directional 6 kw allotment. This is obviously a more "efficient" use of this spectrum than one which requires a directional transmitting antenna. Section 307(b) of the Communications Act (47 U.S.C. § 307(b)) mandates that spectrum be allotted in "a fair, efficient and equitable" manner.

2) As an alternative to allotting Channel 298A to North Kingsville, as the Engineering Exhibit (att.1) shows a superior allotment is that of channel 241A. The allotment of Channel 241A to North Kingsville is superior to that of Channel 298A because it not only permits North Kingsville to have a first local service, but it does so in such a manner as to leave Channel 298A still available to be allotted to either Fairview or Cambridge Springs.

Additionally, the allotment of Channel 241A to North
Kingsville is superior to that of Channel 298A because it permits
more efficient use of the broadcast spectrum. In its
counterproposal NKB concedes that the use of Channel 298A at
North Kingsville requires the use of a directional transmitting
system to protect two Canadian Channels. Since the use of
Channel 241A at North Kingsville will permit the full 6 kw ERP in
all directions it is superior per se because it is a more
"efficient" use of the spectrum than that of Channel 298A.

Thus, since channel 241A can be allotted to North

Kingsville, it is respectfully submitted that the sole issue for
the Commission to resolve in this proceeding is whether it is
more in the public interest to allot Channel 298A to Fairview or
to allot it to Cambridge Springs.

# II <u>Fairview vs. Cambridge Springs</u>

In addition to the engineering consideration that it is more "efficient" to allot Channel 298A to Cambridge Springs than to Fairview, it is respectfully submitted that it is more in the

public interest to do so. In <u>Revision of FM Assignment Policies</u>
and <u>Procedures</u>, 90 FCC 2d 88 (1982) the Commission established
the following priorities:

- (1) First fill-time aural service; [white area]
- (2) Second full-time aural service; [gray area]
- (3) First local service; and,
- (4) other public interest matters.

Therein, the Commission held it was not necessary to hold a hearing to determine the real intent of the petitioner in a rule making. In <u>Sandy Springs</u> the Commission held that whatever the Petitioner's intent may or may not have been where the proposed community is but a suburban appendage than as a matter of law it was not a realistic first service proposal.

Prior to <u>Sandy Spring</u>, in considering the fourth factor there were but three criteria: population, reception services and proximity. Here the difference in population between Fairview (1,988 persons) and Cambridge Springs (1,837 persons) is <u>de minimus</u>. The Erie stations are so proximate in location to Fairview that they must by FCC requirement address the needs of Fairview. Cambridge Springs on the other hand is some 13 miles from the small town of Meadville, Pennsylvania. While Erie has a population of 108,718 persons, Meadville has but 14,318 persons. Thus, an allotment of Channel 298A to Cambridge Springs is preferable under two of the three public interest criteria and because of the <u>de minimus</u> difference in population the third criteria becomes moot.

In his comments and counterproposal, Sauber submitted extensive demographic data to show that the allotment of Channel 298A to Cambridge Springs is clearly more in the public interest than would be the allotment of Channel 298A to Fairview. Sauber showed that Cambridge Springs is an isolated community in the Meadville, Business Trading Area (BTA No. 287). Cambridge Springs was shown to have an extensive number of economic, political and cultural organizations.

In contrast to the showing of public interest factors for allotting Channel 298A to Cambridge Springs contained in Sauber's counterproposal, other than the population of Fairview, KDC has not supplied one scintilla of evidence as to the existence of any independent economic, political and cultural organizations located in Fairview.

Thus, KDC in support of its allegation that the allotment of Channel 298A to Fairview would provide a first local service supplies none of the data from which the Commission could determine whether that allegation is fact or fiction.

In <u>FM Channel Assignments (Eatonton, Sandy Springs, Georgia: Anniston, Lineville, Alabama</u>, 6 FCC Rcd 6580, 6585 (Chief, Mass Media Bureau, 1991) ("Sandy Springs"), the Commission recognized that an assertion that an FM allocation will provide a first local service may, in reality, be more fiction than fact.

Since KDC did not supply such data in either its Petition for Rulemaking or in the comments it would be patently unfair to permit KDC to do so in its reply, because this would deprive both Sauber and NKB the opportunity to respond.

In his comments Sauber showed that, in fact, Fairview was but a mere appendage of the adjacent city of Erie (population 108,718 persons).

While <u>Sandy Springs</u> is novel in the sense that it applied three factors to reach the conclusion in a rulemaking proceeding that Sandy Springs should not be awarded a first local allotment preference, the rationale behind the utilization of these three factors has been Commission policy for decades in the comparative hearing process.

The so-called "Huntington Doctrine" was applied by the Commission for decades. In <u>Arizona Number One Radio, Inc.</u>, 2 FCC Rcd 44,45 n.11 (1987), the Commission considered four criteria to ascertain whether the proposed service was, in fact, merely a thinly veiled attempt to take advantage of the first local service Section 307(b) preference while, in reality, proposing to provide but one more service to the larger adjacent community.<sup>2</sup> These four criteria are:

"(1) power and class of station; (2) the independence or interdependence of the specified 'community' to central city of 'urbanized area'; (3) size and proximity of specified 'community' to central city of 'urbanized area', and (4) signal coverage."

In New Radio Corp. v. FCC, 804 F. 2d 756,761 (DC Cir. 1986) the Court suggested that the FCC may not rely solely on the third criterion (size and proximity), but must also require evidence on

<sup>&</sup>lt;sup>2</sup> As Sauber showed in Ex. 3 to his counterproposal, KDC, Inc. is the licensee of WLKK(AM) licensed to Erie, Pennsylvania.

<sup>&</sup>lt;sup>3</sup> It appears that the only change made in applying these Huntington Doctrine factors in <u>Sandy Springs</u> was to combine factors (1) and (4).

the second (independence or interdependence). In <u>Interstate</u>

<u>Broadcasting System of Arizona v. FCC</u>, 64 RR 2d 1255, 1257 (DC Cir. 1988)<sup>4</sup> ("Interstate") the court held:

"It is only sensible, however, that the required showing of interdependence should vary depending on the degree to which the third criterion - relative size and proximity - suggests that the community of license is simply a suburban appendage of a large central city. Thus, while a strong showing of interdependence would be required when the specified community is relatively large and far away from the central city, less evidence would be necessary to support a Huntington exception when the proposed community of license is quite small and close to the central city."

In his comments and counterproposal at pp 2-3 Sauber showed that Fairview (pop. 1,988) was less than 10 miles from downtown Erie, Pennsylvania (pop. 108,718) and interconnected by Interstate Routes 20, 79, and 90.5 Thus, under the Court's holding in <u>Interstate</u> a lesser showing of interdependence will meet the requisite showing to deny a first local service preference using the <u>Sandy Springs</u> test.

In neither its Petition for Rulemaking nor in its Comments in this proceeding does KDC even admit that Erie exists. Yet as att. No. 3 hereto reflects Fairview's utilities, medical services, and its principal business organizations are all located in Erie. Thus, clearly Fairview is best a suburban appendage of Erie. Therefore under the holding in <u>Sandy</u>

<sup>&</sup>lt;sup>4</sup> This opinion was not published in accordance with D.C. Cir. R. 14 (c).

<sup>&</sup>lt;sup>5</sup> See att. No. 2

<u>Springs</u><sup>5</sup>, Fairview is not entitled to a first local service preference.

Therefore, it is respectfully submitted that the resolution of this proceeding most in the public interest is to allocated Channel 298A to Cambridge Springs and Channel 241A to North Kingsville, by denying Fairview a first local service preference because it is merely a suburban appendage of Erie.

Respectfully submitted for Thomas J. Sauber

By:

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Washington, DC 20036

(202) 785-2800

lpd/rwh/1203.rep

<sup>&</sup>lt;sup>5</sup> While <u>Sandy Springs</u> involves a change of an existing allocation rather than a new allocation, this would appear from the public policy considerations addressed in <u>Sandy Springs</u> to be a distinction without a rational difference.

# ATTACHMENT 1

JOHN J. MULLANEY JOHN H. MULLANEY, P.E.

# **MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT GAITHERSBURG, MD 20877

301 921-0115

# ENGINEERING EXHIBIT RM-1:

THOMAS J. SAUBER CAMBRIDGE SPRINGS, PENNSYLVANIA

REPLY COMMENTS

MM DOCKET 93-250 - FAIRVIEW, PENNSYLVANIA

COUNTER PROPOSAL - CAMBRIDGE SPRINGS, PENNSYLVANIA

COUNTER PROPOSAL - NORTH KINGSVILLE, OHIO

NOVEMBER 30, 1993

ENGINEERING STATEMENT IN SUPPORT OF A
PETITION FOR RULE MAKING
TO AMEND

THE FM TABLE OF ASSIGNMENTS

ORIGINAL SIGNATURE

# **MULLANEY ENGINEERING, INC.**

# ENGINEERING EXHIBIT RM-1:

# THOMAS J. SAUBER CAMBRIDGE SPRINGS, PENNSYLVANIA

# REPLY COMMENTS MM DOCKET 93-250 - FAIRVIEW, PENNSYLVANIA COUNTER PROPOSAL - CAMBRIDGE SPRINGS, PENNSYLVANIA COUNTER PROPOSAL - NORTH KINGSVILLE, OHIO

# TABLE OF CONTENTS:

- 1. Declaration of Engineer
- 2. Narrative Statement.
- 3. Figure 1, Channel Allocation Study for Ch. 241A. from North Kingsville, OH.
- 4. Figure 2, Canadian Contour Protection Map Ch. 241A.

### DECLARATION

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Thomas J. Sauber to prepare an engineering statement in support of a Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

John J. Wullaney

Executed on the 30th day of November 1993.

# ENGINEERING EXHIBIT RM-1:

# THOMAS J. SAUBER CAMBRIDGE SPRINGS, PENNSYLVANIA

REPLY COMMENTS

HM DOCKET 93-250 - FAIRVIEW, PENNSYLVANIA
COUNTER PROPOSAL - CAMBRIDGE SPRINGS, PENNSYLVANIA
COUNTER PROPOSAL - NORTH KINGSVILLE, OHIO

# NARRATIVE STATEMENT:

# I. GENERAL:

This engineering statement has been prepared on behalf of Thomas J. Sauber. The purpose of this statement is to support reply comments in MM Docket 93-250 concerning the simultaneous requests for the allotment of FM Channel 298A to the following three communities:

- 1. Fairview, PA
- 2. Cambridge Springs, PA
- 3. North Kingsville, OH

Since all three cities are within 55 kilometers of each other and considering the fact that the FCC rules require a co-channel Class A separation of 115 kilometers, it is clear that the simultaneous requests for the allotment of FM Channel 298A are mutually exclusive.

# **MULLANEY ENGINEERING, INC.**

# II. ENGINEERING DISCUSSION:

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# A. Alternate Channels for Cambridge Springs, PA:

A preliminary review of all 80 commercial FM channels was made to determine what, if any, other channels are available to serve the community of Cambridge Springs, PA. The analysis indicates that only channel 298A is available with a site close enough to place a city grade contour over Cambridge Springs.

# B. Alternate Channels for North Kingsville, OH:

A preliminary review of all 80 commercial FM channels was made to determine what, if any, other channels are available to serve the community of North Kingsville, OH. The analysis indicates that channels 241A & 298A are the only channels available with a site close enough to place a city grade contour over North Kingsville.

The following geographic coordinates are for the city of North Kingsville, OH:

Latitude: 41° 54′ 18" Longitude: 80° 41′ 36"

Figure 1 is a Channel Allocation Study on 241A from the Reference Point for North Kingsville which indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings. From this study it can be determined that the proposed special reference point exceeds all of the minimum separations to everything except CFPL-FM which operates on Channel 240C1 at London, Ontario. It should be noted that the indicated short spacing

# Thomas J. Sauber - Reply Comments MM Docket 93-250 (11/93)

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# **MULLANEY ENGINEERING, INC.**

of 55.3 km is based upon the requirement that a U.S. 6 kW facility is considered as a Class B1 (25 kW) with respect to all Canadian stations. The required separation for a 3 kW facility is 164 km while the required separation for a B1 facility is 181 km.

Figure 2 is a map which illustrates the locations of the protected and interfering contours for CFPL-FM and 241A at North Kingsville. The contours are based upon the assumption of maximum permissible ERP and HAAT for each location. The protected contour for the Canadian station is the 54 dBu contour and for the U.S. Class A facility is the 60 dBu contour. The U/D ratio for first adjacent facilities is -6 dB. The following distances were used:

CFPL-FM - London, ON
Protected 54 dBu 86 kilometers
Interfering 54 dBu 105

PRM 241A - North Kingsville, OH
Protected 60 dBu 28 kilometers
Interfering 48 dBu 60

As can be seen, while some overlap of contours will occur, all of the overlap is over Lake Erie. Canadian - U.S. Agreement indicates that overlap over water does not result in objectionable interference. Consequently, FM Channel 241A qualifies as specially negotiated short spaced allotment. should be understood that the North Kingsville facility would be permitted to radiate the full 6 kW ERP all directions since no objectionable interference results. No directional transmit antenna would be required.

# **MULLANEY ENGINEERING. INC.**

# C. Public Interest Showing:

With the allotment of FM Channel 241A in lieu of 298A to North Kingsville, OH, it is no longer in conflict with either Fairview or Cambridge Springs, PA.

Consequently, the only remaining conflict is between the communities of Fairview and Cambridge Springs, PA.

From the initial counter proposal, it is clear that an allotment of 298A at Fairview will require the use of a directional transmitting antenna to protect Canada. In addition, it is clear that Fairview is a bedroom community of Erie, PA since it is in the same Arbitron radio market & the Rand McNally BTA. Consequently, Fairview should not be allowed to claim that it is a separate community for comparison purposes. A review of the FCC's engineering data bases indicates that there are four commercial AMs, four educational FMs, four commercial FMs, five commercial TVs and two LPTV/Translators licensed to the community of Erie, PA.

In contrast, an allotment of 298A at Cambridge Springs will <u>not</u> require a directional antenna to protect Canada and, therefore, it will be a <u>fully</u> utilized 6 kW allotment under the context of the domestic rules. Cambridge Springs is <u>not</u> immediately adjacent to a primary city in a major radio market and, therefore, it is entitled to claim that it is a separate community with no local aural service.

# **MULLANEY ENGINEERING, INC.**

# III. SUMMARY:

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Thomas J. Sauber requests that the FM Table of Assignments be amended to allot FM Channel 298A at Cambridge Springs, PA and Channel 241A in lieu of 298A to North Kingsville, OH and that the community of Fairview, PA be denied additional service unless a non-conflicting channel arrangement can be established.

City	Present	Proposed				
Cambridge Springs, PA	-	298A				
North Kingsville, OH	-	241A				
Fairview, PA	_	DENIED				

Thomas J. Sauber believes that the proposed allotment will Serve the Public Interest and will promptly file an application should 298A be allotted to Cambridge Springs.

November 30, 1993.

# \*

LAST UPDATE: 931110 \*\*\*\*\*\*\*\*\*\*\*\*\*\*

RM	241 A	FA	POLARIZATION	ERP	(KW)	HAAT	RCAMSL
NORTH KINGSVILLE OH	US			HOR PLN	BN TILT	(METER)	(METER)
41.5418 80.4136 (B.)	<b>9488</b> )		HORIZONTAL	6.000	0.000	100.0	
			VERTICAL	6.000	0.000	100.0	

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

CALCULATED HAAT FROM TOPH DATA	DACE

					AZINUTH	HAAT	HAAT	CONTOURS	(101)	
INTERFERING	BOME	STIC	CAMA	BIAN	DEGREES	(METERS)	(FEET)	70 DBU	60 BBU	54 <b>90</b> U
	DBU	KH	DBU	KM	0.0	140.7	461.7	19.4	33.0	44.4
CO CHANNEL	( 40.0)	86.7	(34.0)	98.9	45.0	136.5	447.7	19.1	32.5	43.8
1ST ADJACENT	( 54.0)	43.7	(48.0)	35.0	90.0	72.1	236.7	13.6	24.3	33.4
2ND ADJACENT	(80.0)	9.1	(74.0)	7.0	135.0	47.8	156.9	11.2	20.1	27.6
3RB ADJACENT	(100.0)	2.8	(94.0)	2.3	180.0	50.5	165.7	11.6	20.7	28.4
					225.0	76.1	249.7	13.9	24.9	34.2
PROTECTED	( 60.0)	28.3	(54.0)	38.7	270.0	136.4	447.4	19.1	32.5	43.8
					315.0	139.9	458.9	19.3	32.9	44.3
CITY BRADE	( 70.0)	16.2								
					AVERA	BE 100.0	328.1	16.2	28.3	38.7

EST SITE ELEVATION: 204.8 m.; 672.0 ft. EST RAD CENTER AGL : 106.9 m.; 350.8 ft. RAD CENTER A.M.S.L.: 311.7 m.; 1022.8 ft.

\*\*\*THE CANADIAN HORDER IS 43.6 KM ON A BEARING OF 349.8 DEG. TRUESS\*

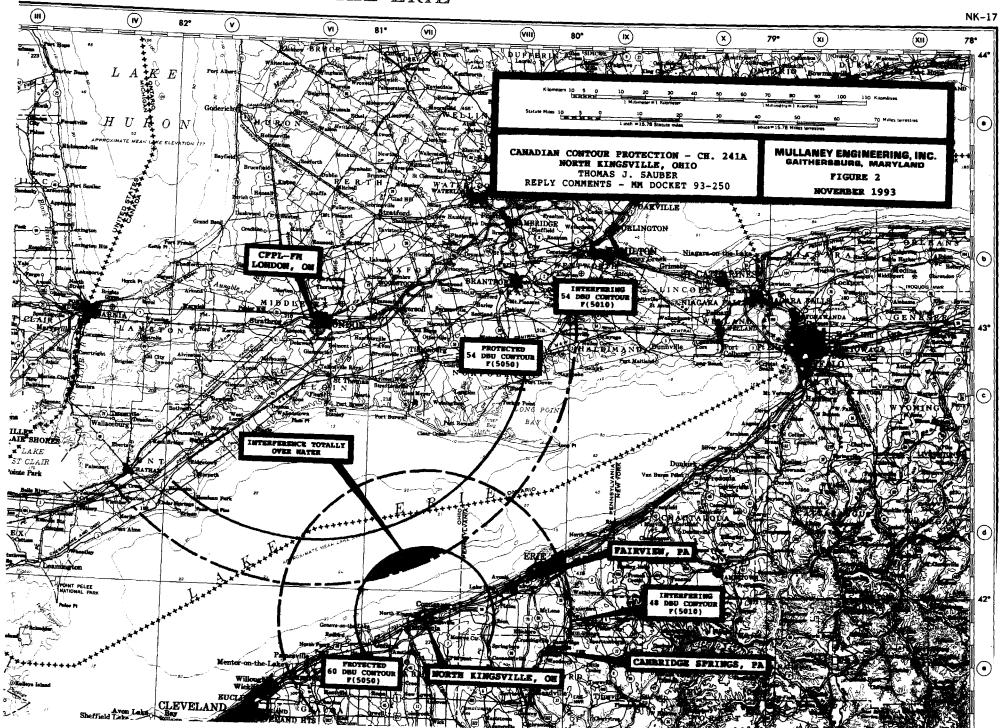
AZIH	UTH								LA1	Ī	LONG			ERP	(KW)	HA	AT D	I-CON	P-CON		IR	IC	RFZL
FROM	TO	CALL	STS	FILE	NUMBER	CITY	ST	C		(D.MM	65)	REL	CHN	HORZ	VERT	(	H) A		F5050 (KN)		RSEP (KM)	RSEP (KH)	IR I
232.4	51.9	MCLV	LIC	DLH87	1207KD	Cleveland	OH	A	41.3	2632	B1.2928	JRN.	238B	31.H	ı 31.	U	189	11017	1007	84.0			
			LIC			Sharpsvil														77.1			C
171.8	351.9	WHTX	APP	врн90	0517IE	Sharpsvil	PA	A	41.	1305	80.3343	151	240A	6.H	۱ 6،	V	100E			77.1	72.		C
38.2	157.9	CFPLFM	OPE			London	ON	C	42.5	5715	81.1558	1ST	240C1	180.H	180.	V	27 <b>0</b> D			125.7	181.		S
**	CONNE	NT##SPE	CIAL	<b>Æ</b> GOTIAT	ED SHO	RT-SPACED	ALL	OC/	TIO	٧,													
159.7	340.2	WUTY	LIC	BLH92	0206KC	Pittsburs	PA	A	40.2	2349	79.5743	CO	241B	44.H	44.	Ų	159			178.4	178.		C
250.4	69.2		VAC			Huron	OH	A	41.2	2336	82.3318	CO	241A	H	ł	V	0			165.2	115.		
N	OTE:	5 PEND	ING AF	PLICATI	ONS																		
53.3	234.5	MJYE	LIC	BLH60	53	Buffalo	NY	A	42.5	5310	78.5225	CO	241B	50.H	50.	V	146			185.3	178.		C
123.2	303.9	WKOWFH	LIC	BLH92	0 <b>9</b> 21KD	Oil City	PA	A	41.3	2345	79.3953	1ST	242A	6.0H	1 6.0	W	100			102.7	72.		
28.5	209.3		ADD			Toronto	DN	C	43.3	3856	79.2255	<b>1</b> \$T	24201	H	l l	V				221.4	181.		
21	COMME	NT##Spe	cially	, nesati	ated,	short-spac	ed .	all	late	ent, :	ltd. to	the	foll										
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NOTE: SHORT SPACING TO CFPL-FM MOES NOT RESULT IN ANY INTERFERENCE OVER LAND.

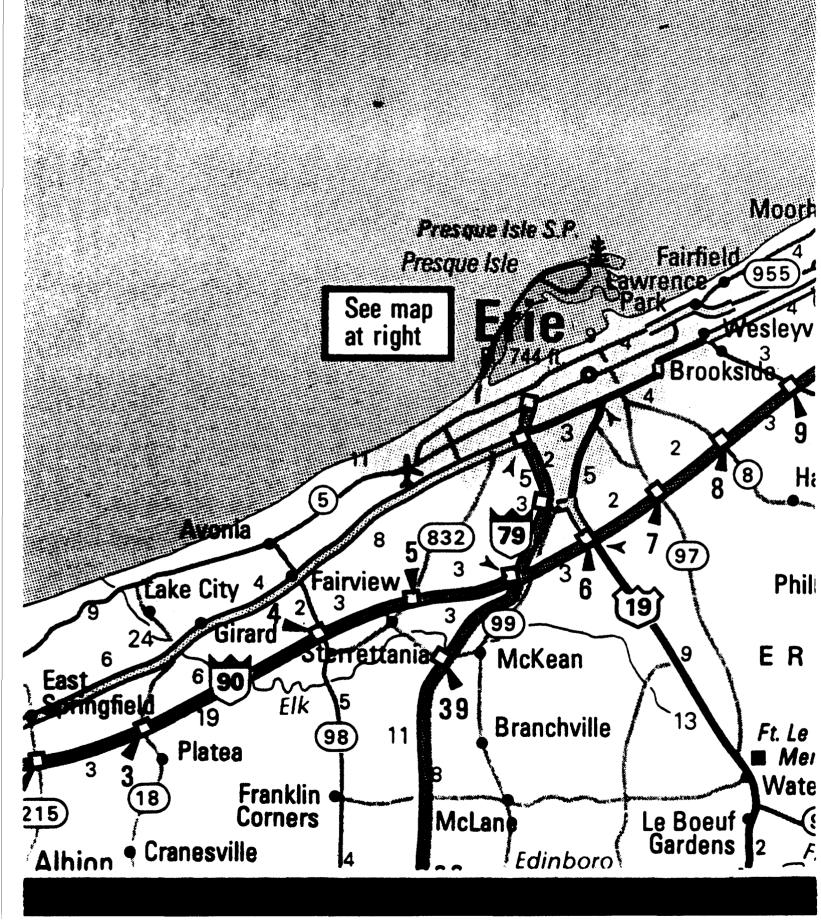
CHANNEL ALLOCATION STUDY - CH. 241A NORTH KINGSVILLE, OHIO THOMAS J. SAUBER REPLY COMMENTS - MM DOCKET 93-250

MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND FIGURE 1

NOVEMBER 1993



# ATTACHMENT 2



# ATTACHMENT 3

# INTERDEPENDENCE OF FAIRVIEW ON ERIE

UTILITIES

NAME

COMMENTS

Fairview and Eric share the same:

Electric Power

Pennsylvania Electric Company

(Penelec-GPU)

Offices and plant repair departments are located in Erie. There is no Penelec office

in Fairview.

Natural Gas

National Fuel

Offices and plant repair departments located in Erie. There is no National Fuel office in

Fairview.

Telephone Service

General Telephone (GTE)

GTE has no office or plant repair department in Fairview. There is an unmanned switching

facility.

All Fairview telephone listings are included in the Brie Telephone Directory. Pairview business places advertise in the Erie Yellow Pages. There is no separate Fairview Directory. Phone calls between Erie and Fairview

are toll free.

Sewage Disposal

MUNISCO - Erie Water Authority

Fairview sewage is piped into the Millcreek system and passed on to Erie. Brie maintains the only disposal plant in the immediate area. The respective urbanized townships own their sewer lines. Fairview obtains its water from

wells.

Cable Television

TCl is headquartered in Millcreek Township and has its head end in Millcreek. (Millcreek is the most populous township in Erie County, and is located between the City of Brie and Fairview Township. TCI Cable serves every community in Eric County, except the City of Brie, the City of Corry, and Edinbore Borough.

# HEALTH CARB

### NAMB

### COMMENTS.

# Hospitals:

5t. Vincent's

lirio

Major area Health Center.

Remot Erie

Major urva Health Center.

Metro Health Center

Erie

A full-service estsopsthic hospital.

Milloreek Community Hospital

Milloreek

A full-service esteopathic hospital.

Veterens Affairs Medical Center

Erio

A United States Government-operated full-service hospital for vaterans.

# Limited Care Centers:

Immediate Care

Bris

Walk-in-type facilities for miner accidents and non-complicated health care needs.

Urgi-Care Brie

Note: Except for doctor and dentist offices, there are no health care facilities in Fairview

# BUSINESS/ORGANIZATION

# NAME

# COMMENT

Businees and Commerce Organization

Greater Erie Chember of Contracto

Many Fairview business places are Chamber of Commerce members.

Community Services:

United Way

G.B.C.A.C.

The Millereek Mall, a large regional shopping ceriter, is located adjacent to Spie within Millereek Township.

Retailing/Shopping Certers

West Erie Plaza, located at the Erie City boundary in Milicreek Township.

Village West Shopping Plans, located in Milloresk Township.

of Commerce members.

The Greater Erie Chamber maintains its office in Erie.

While offices are maintained only in Erie, the needy of all commutities in Erie County, including Fairview, are serviced by the United Way of Erie County and G.E.C.A.C. (Greater Erie Community Action Committee)

While Fairview has a limited complement of retail outlets for convertence shapping, residents depend upon the Millerrek Mall and West Frie Placa for significant shapping requirements. The Millereck Mall and West Erie Placa are located 8.0 and 8.5 miles respectively from Fairview Borough.